

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RECOVERY EFFORT INC.,	:	
	:	
Plaintiff,	:	
	:	19 Civ. 5641 (VSB) (KHP)
- against -	:	
	:	
ZEICHNER ELLMAN & KRAUSE LLP,	:	
WACHTEL MISSRY LLP, YOAV M.	:	
GRIVER, and WILLIAM B. WACHTEL,	:	<b><u>NOTICE OF MOTION</u></b>
	:	
Defendants.	:	
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**PLEASE TAKE NOTICE** that upon the Declaration of Michael T. Sullivan, executed on March 30, 2020, the accompanying memorandum of law, and all prior pleadings and proceedings had herein, defendants Zeichner Ellman & Krause LLP and Yoav M. Griver (together, the “ZEK Defendants”) will move before the Honorable Vernon S. Broderick, United States District Judge, in Courtroom 518 of the Thurgood Marshall U.S. Courthouse located at 40 Foley Square, New York, New York, for an order, pursuant to Fed. R. Civ. P. 12(b)(6) and the applicable statutes of limitations, dismissing the First Amended Complaint with prejudice and for such other and further relief as is just and appropriate.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Court’s March 17, 2020 Order (ECF 40), any opposing affidavits and answering memoranda shall be served on or before May 7, 2020, and any reply papers shall be served on or before May 28, 2020.

Dated: New York, New York  
March 30, 2020

**SULLIVAN & WORCESTER LLP**

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